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ROLAND G. RIOPELLE  
MAURICE H. SERCARZ\*

\*ADMITTED IN NY & NJ

August 1, 2023

**BY ECF**

The Honorable Edgardo Ramos  
United States District Court  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

**Re: *United States v. Markin, et al*, 22 CR 395**  
**Seth Markin - Defendant**

Your Honor:

I write to request that the Defendant's travel restrictions be modified to permit him to travel to Rehoboth Beach, Delaware from August 9, 2023 through August 14, 2023.

**Background**

On July 21, 2022, the Defendant was named in the instant Indictment. The Indictment charges him with Conspiracy and substantive counts of Securities Fraud and Tender Offer Fraud based upon allegations that he misappropriated material non-public information relating to plans by Merck & Company, a publicly traded pharmaceutical company, to acquire Pandion Therapeutics, a publicly traded biotechnology company; and, that the Defendant purchased Pandion stock and encouraged others to do so based upon this information.

On or about July 25, 2022, the Defendant was arraigned to the instant Indictment. He was released on an unsecured bond of \$200,000, co-signed by the Defendant's parents. The Defendant's travel is limited to the Southern District of New York, the Eastern District of New York, the District of New Jersey, and the Eastern District of Pennsylvania, where the Defendant resides with his parents.

### **The Instant Request**

This Court has approved a series of travel requests that enable the Defendant to travel to Tattoo Arts conventions together with his friend, Jamilia Kazimalava.

The instant request is made so that the Defendant can accompany Ms. Kazimalava to Rehoboth Beach, Delaware. While there, the Defendant intends to assist her while she works at the Sedna Tattoo Studio.

The Defendant will supply full information regarding his lodging to Pretrial Services in advance of the trip, and will conform to any additional reporting requirements that are proposed by Pretrial Services.

I have spoken to Janitza Gomez, the Pretrial Services Officer tasked with monitoring the Defendant's compliance with his bail conditions. She informs me that he has been fully compliant with the terms of his bail; and, that she will have no objection to the request herein.

### **Conclusion**

For all the reasons set forth herein, we respectfully request that the Defendant be permitted to make the trip described above.

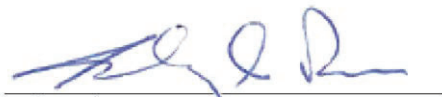
Most respectfully,

/s/ Maurice H. Sercarz

cc: All Parties (by ECF)

USPSC Janitza Gomez (by email)

The application to permit travel as described in Markin's letter is granted.  
SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: 8/1/2023

New York, New York